

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader
Plaintiff

v.

BRIAN WATSON, WDC HOLDINGS, LLC,
PLW CAPITAL I, LLC, BW HOLDINGS,
LLC, AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.

Interpleader Defendants.

AMAZON.COM, INC. AND AMAZON DATA SERVICES, INC.'s
INITIAL DISCLOSURES

D. DAMAGES

Pursuant to Rule 26(a)(1)(A)(iii), Amazon intends to seek compensatory damages, restitution, and disgorgement of all earnings, profits, compensation, and all other ill-gotten gains obtained by Defendants based on their illegal conduct, as well as pre- and post-judgment interest, attorneys' fees, and a permanent injunction. Amazon has yet to ascertain the extent to which it has been damaged as a result of Defendants' conduct, but Amazon expects discovery to reveal the extent of the damages suffered by Amazon. Some or all of Amazon's injuries are ongoing, and Amazon will supplement these disclosures to identify the amount of damages arising from Defendants' conduct as fact and expert discovery progress.

E. INSURANCE

Pursuant to Rule 26(a)(1)(A)(iv), Amazon is not a party to any insurance agreement under which an insurance carrier may be liable to satisfy all or part of a judgment entered on any of the claims stated in this action.

* * *

By making these disclosures, Amazon does not concede the relevance or admissibility of any of the information provided, nor does Amazon waive the assertion of any possible privilege or other proper bases on which information and/or documents may be withheld. Amazon further reserves all rights to supplement and correct these Initial Disclosures to include information hereafter acquired based upon its continued investigation, discovery, trial preparation, and/or other analysis.

Dated: December 3, 2021

By,

s/ Michael R. Dziuban

Elizabeth P. Papez (*pro hac vice*)

Patrick F. Stokes (*pro hac vice*)